

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

DON GIBSON, LAUREN CRISS, and  
JOHN MEINERS, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

NATIONAL ASSOCIATION OF  
REALTORS, COMPASS, INC., EXP  
WORLD HOLDINGS, INC., REDFIN  
CORPORATION, WEICHERT  
REALTORS, UNITED REAL ESTATE,  
HOWARD HANNA REAL ESTATE  
SERVICES, and DOUGLAS ELLMAN,  
INC.

Defendants.

Case No. 4:23-cv-00788-SRB

Honorable Judge Bough

**EXP WORLD HOLDINGS, INC., REDFIN CORPORATION,  
WEICHERT REALTORS, UNITED REAL ESTATE,  
HOWARD HANNA REAL ESTATE, AND DOUGLAS ELLIMAN, INC.’S  
JOINDER IN NATIONAL ASSOCIATION OF REALTORS’® MOTION TO STAY**

Defendants eXp World Holdings, Inc., Redfin Corporation, Weichert Realtors, United Real Estate, Howard Hanna Real Estate, and Douglas Elliman, Inc. (collectively the “Corporate Defendants”) hereby join in the motion of the National Association of Realtors® to stay this matter pending this Court’s resolution of NAR’s post-trial motions and, should the Court deny those motions, NAR’s appeal in *Burnett v. National Association of Realtors*, No. 4:19-cv-0332-SRB (W.D. Mo. Apr. 29, 2019).<sup>1</sup> The arguments raised in NAR’s motion apply equally to the Plaintiffs’ claims against the Corporate Defendants because those claims likewise implicate, among other issues, the issues that NAR’s forthcoming post-trial motions and appeal will challenge.

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<sup>1</sup> The Corporate Defendants join in NAR’s motion subject to and without waiver of any defenses that may be available to them, including without limitation any defenses relating to service, process, arbitrability, and jurisdiction.

Accordingly, a stay of the claims against the Corporate Defendants also would save substantial resources for both the Court and litigants.

Dated: December 29, 2023

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 29, 2023, a copy of the foregoing document was electronically filed through the ECF system and will be sent electronically to all persons identified on the Notice of Electronic Filing.

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